



support of their Response in Opposition to Defendant's Partial Motion for Summary Judgment, N.D. Ind. L.R. 56-1(b)(1)(B), in the form of affidavits from six additional identified Class Members held in the Allen County Jail on or before October 31, 2015:

1. James Davis;
2. Frederick Neel;
3. Artavius Richards;
4. Mylinque Wallace;
5. Nike-Shail White; and
6. Jerry Williamson.

Wherefore, based on their argument and the evidence submitted, Plaintiffs respectfully request the Court deny Defendant's Motion for Partial Summary Judgment in its entirety, and grant all other just and proper relief.

Respectfully,

**CHRISTOPHER C. MYERS & ASSOCIATES**

/s/ David W. Frank

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Counsel for Certified Class

**CERTIFICATE OF SERVICE**

I certify that on September 27, 2018 a true and correct copy of the foregoing document was served electronically via CM/ECF to all counsel of record.

/s/ David W. Frank

David W. Frank

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